

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

OMAR WINSTON KHOURI,

Plaintiff,

vs.

**NATIONAL GENERAL INSURANCE
MARKETING, INC., AND
AMERICAN SELECT PARTNERS, LLC,**

Defendants.

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Civil Action No. 1:20-cv-00580

AGREED MOTION TO MODIFY RULE 26(F) REPORT

Defendants National General Insurance and Marketing, Inc. American Select Partners, LLC (together, “Defendants”), by and through their counsel, and with the agreement of Plaintiff Omar Winston Khouri (“Plaintiff”), *pro se* (together, the “Parties”), file their Motion to Modify Rule 26(f) Report and respectfully state as follows:

With this Motion, the Parties seek to modify the Rule 26(f) Report, Docket No. 13, filed herein as follows: Extend the completion of discovery from May 1, 2021 to June 30, 2021.

The parties have engaged in extensive written discovery and conferred about that discovery. In seeking to extend the discovery period, the parties seek to complete deposition discovery, which includes non-party depositions in more than one jurisdiction, and which, coupled with the Covid-19 pandemic’s restrictions and protocols, have presented logistical, timing, and technology issues. The Parties believe that the requested brief extension will allow them to complete the depositions and discovery.

The agreed requested extension of time to complete discovery is not sought solely for purposes of delay, but in order so that justice may be done in this case.

Respectfully submitted,

/s/ Edwin W. Bowden
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Of Counsel/

/s/Charles W. Gameros, Jr., P.C.
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendants and Plaintiff, *pro se*, have discussed the forgoing document, and that Plaintiff AGREES with the extension described herein.

/s/Charles W. Gameros, Jr., P.C.
Attorney for Defendants

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.3(d), the undersigned hereby certifies absent the caption, signature lines, and certificates, the program used to prepare this Motion prior to its conversion to portable document format calculated the number of words in it as 178.

/s/Charles W. Gameros, Jr., P.C.
Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on the following persons or entities via the means indicated this the 15th day of April, 2021:

VIA REGULAR MAIL

Omar Winston Khouri
1009 Cross Gate Road
Winston-Salem, NC 27106

Pro se

/s/Charles W. Gameros, Jr., P.C.

Attorney for Defendants